

ADAM WANG, Bar No. 210233
LAW OFFICES OF ADAM WANG
12 South First Street, Suite 613
San Jose, CA 95113
Tel: (408) 292-1040
Fax: (408) 286-6619
waqw@sbcglobal.net

TOMAS E. MARGAIN, Bar No. 193555
LAW OFFICES OF TOMAS E. MARGAIN
1550 Bryant Street, Suite 725
San Francisco, CA 94103
Telephone: 415-861-9600
Fax: 415-861-9622
margainlaw@hotmail.com

Attorney for Plaintiffs
Vladimir Balarezo & Osmín Avila

UNITED STATES DISTRICT COURT
FOR DISTRICT OF NORTHERN CALIFORNIA

VLADIMIR BALAREZO, ABELARDO
GUERRERO, VICTOR FUNEZ & OSMIN
AVILA, and on behalf of other similarly
situated

Plaintiffs,

vs.

NTH CONNECT TELECOM INC., AND
STEVEN CHEN,

Defendants

Case No.: C07-05243 JF

**DECLARATION OF ADAM WANG IN
SUPPORT OF PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS**

Date: July 1, 2008

Time: 10:00 am

Judge: Patricia V. Trumbull

I, the undersigned, declare as follows:

1. I am an attorney duly authorized to practice before this Court and one of Plaintiffs' attorneys of record in this action. I base this declaration on my personal knowledge unless otherwise indicated.

2. Exhibit 1 hereto is a true and accurate copy of Plaintiff's Amended Request for Production of Documents, served on Defendants Set One on February 26, 2008.

1 3. Exhibit 2 hereto is a true and accurate copy of Plaintiff's Blarezo's Declaration
2 filed in Conjunction with an Opt-in Motion granted by Department 3 of this Court.

3 4. Exhibit 3 hereto is a true and accurate copy of Plaintiff's Avila's Declaration filed
4 in Conjunction with an Opt-in Motion granted by Department 3 of this Court.

5 5. Exhibit 4 hereto is a true and accurate copy of Defendants' Response to Plaintiff'
6 Amended Request for Production of Documents Set One.

7 6. Prior to filing this motion, I met and conferred with Defendants' counsel and
8 reached an impasse on the discovery dispute before this Court.

9 7. Exhibit 5 hereto is a true and accurate copy of my letter dated May 7, 2008 sent
10 for the purpose of meeting and conferring with Defendants to resolve the discovery issues
11 informally.

12 8. After sending Exhibit 5, Defendants' counsel and I exchanged e-mails in which it
13 was clear that we had exhausted all attempts to resolve this issue prior to filing this motion.
14 Exhibit 6 hereto is a true and accurate copy of an e-mail dated May 14, 2008 from Defendants'
15 counsel in response to my May 7, 2008 meet and confer letter.

16 9. Exhibit 7 hereto is a true and accurate copy of my e-mail to Defendants' counsel
17 Ms. Donna Butler in response to her May 14, 2008 e-mail in which I responded to her individual
18 concerns in the hope of resolving the discovery dispute informally.

19 10. Exhibit 8 hereto is a true and accurate copy of a May 15, 2008 e-mail from
20 Defendants counsel Ms. Donna Butler, stating that no documents would be produced with
21 respect to putative class members other than named Plaintiffs.

22 I declare under penalties of perjury under the laws of the United States that the foregoing
23 is true and accurate.

24 Dated: May 27, 2008

By: /s/ Adam Wang
Adam Wang